



KARPF, KARPf & CERUTTI, P.C.

ATTORNEYS AT LAW

3331 Street Road
Two Greenwood Square
Suite 128
Bensalem, PA 19020
Tel: (215) 639-0801
Fax: (215) 639-4970
csipio@karpf-law.com

October 31, 2023

VIA ECF ONLY

Hon. José R. Almonte
U.S. District Court, District Of New Jersey
Frank R. Lautenberg U.S. Post Office & Courthouse Building
2 Federal Square
Newark, NJ 07102

RE: Mandarakas v. The University of Notre Dame du Lac
No. 23-cv-02539-MCA-JRA
Joint Status Report

Dear Judge Almonte,

I represent the Plaintiff in the above-referenced matter. Kindly accept this letter as the parties' joint status report pursuant to the Court's Order of August 7, 2023.

The parties have actively engaged in discovery since the initial conference in August. On August 24, 2023, Plaintiff served interrogatories and document requests upon Defendant. On August 28, 2023, Plaintiff served requests for admissions. Defendant responded to the admissions requests on September 28, 2023 and by agreement the remaining discovery requests on or about October 19, 2023. Defendant has produced documents but not formal responses to the document requests. Defendant intends to serve the formal response with additional documents. Plaintiff is in the process of addressing some perceived deficiencies with Defendant's responses and the parties hope to resolve the same amicably without the need for Court intervention.

Defendant served Plaintiff with interrogatories and document requests on September 20 and 21, 2023 and by agreement the responses will be served on or before November 20, 2023. In order to permit the opportunity to address any follow up requests and/or deficiencies, the parties request that the date for submitting discovery disputes to the Court (as set forth in Paragraph 6 of the current Scheduling Order) be extended to December 20, 2023.

After written discovery is complete, the parties intend to begin depositions. Given the short extensions requested above, as well as the fact that Notre Dame is closed over the holidays (classes

Hon. José R. Almonte

October 31, 2023

Page 2 of 2

resume on January 16, 2024), the parties request that the date to complete depositions and fact discovery be extended from January 8, 2024 to February 15, 2024.

At this time, we request that the Court enter the Consent Confidentiality Order submitted herewith. The proposed Order conforms to the sample Order in Appendix S to the Local Rules.

If Your Honor requires any additional information in advance of the status conference, please do not hesitate to have your staff contact my office.

Thank you for your consideration of this matter.

Respectfully submitted,

KARPF KARPf & CERUTTI P.C.

/s/ W. Charles Sipio
W. Charles Sipio

WCS/

cc: All Counsel of Record via ECF Only